March 6, 2014

Letter – Expression of Interest
VIA ECFS

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

Re: Expression of Interest – Rural Broadband Trials
Connect America Fund, WC Docket No. 10-90

Dear Chairman Wheeler, Commissioners, and Mr. Chambers,

This letter is to express CoquiTel LLC's interest in receiving funding from the Rural Broadband Trials announced at the January 30th FCC Open Meeting.

Background

Provide background information for your business: Name, location, history, services currently provided number of subscribers, and goals for the future.

CoquiTel is a community-based Wireless Internet Service, VOIP provider, and Wireless system integrator located at Carretera 157 Km 12.0, Barrios Damian Abajo, Sector La Hacienda, Orocovis, Puerto Rico. Our current service area includes portions of Orocovis, Morovis, and Ciales focusing on last-mile solutions. The corporation was founded in 2012 by Jose Soto, a RF engineer with over 19+ years in experience in the wireless industry and seasoned entrepreneur, to fill a need in the Puerto Rican infrastructure and telecommunications landscape. As a minority, Hispanic-owned and community backed corporation, CoquiTel's vision is to build and enhance the local telecommunication infrastructure. CoquiTel prides itself as a being a grassroots corporation "by the people for the people" through its involvement of local residents and experienced staff, which include two RF engineers with over 36 years experience combined, a software engineer, as well as CCNA certified professional. CoquiTel provides internet & telephone where currently it is not available or inadequately served by the current local provider/s.

Services currently provided

Our current services offerings provided are:
Wireless Broadband Internet at speeds of 1 Mbps down , 4Mbps down , and 8 Mbps down and 1 Mbps upload (Unlimited and Net Neutral)
B2B Services
Residential and Commercial VOIP Phone Services
Wireless Deployment
Network Administration
And Computer repair and diagnostics

Geographic Territory

CoquiTel's plan is to provide TYPE OF SERVICE to AREAS. Be explicit in naming the geographic areas you propose to serve.

In addition to our current service portfolio mentioned above, CoquiTel would be offering three major additions: CoquiPass , CoquiCell, and video streaming services. The CoquiPass service(Mobile hotspot service), the CoquiCell service (Cellular and SMS services), and the video streaming service would be offered at price levels lower than the current market prices in order to offer a competitive, affordable option in the marketplace.

CoquiTel will furthermore be expanding its network out to a total of 8 towns/pueblos predominantly in their underserved areas. CoquiTel's projected expansion would cover the following areas: Barranquitas, Ciales, Coamo, Corozal, Juana Diaz, Morovis, Villalba, and complete the build out of the Orocovis area.

List of Anchor Institutions

If you plan to connect anchor institutions (schools, libraries, hospitals, community centers, etc.) list them in this section.
CoquiTel would be providing service to any Anchor Institution included in the Census Tract areas provided. The Anchor Institution would agree to provide right-of- way access for installation and agreement confirms to rules set forth by the FCC. Two of such institutions would be Escuela Roman Diaz in Damian Arriba, Orocovis, PR and Escuela in Damian Abajo, Orocovis, PR. Further specific Anchor Institutions would be provided once final rules have been set forth by the FCC in the Rural Trials Experiment.

Proposed technology

What technology and speed are you proposing to provide. Include cost to subscriber.

CoquiTel will build its network to provide high-speed Broadband Internet, VOIP, and Cellular services via WiFi on licensed and unlicensed Wireless frequencies. Our network will be built with emphasize on a DAS model utilizing existing infrastructure such as light posts and host building/structures to provide customers a more direct access point to services provided. This will allow CoquiTel to grow the network at a reasonable cost due to the lack of major frequency licensure fees (except on the 3.65Ghz nodes) and flexibility to build the network to custom fit the RF environment.

Proposed speeds

Proposed speeds would be a minimum 4 Mbps down/ 1Mbps up and maximum of 12Mbps down/2Mbps up. Physical hardware (radios and antennas) would be capable of much higher speeds. Actual location and specific's location RF link budget would determine total capacity of each node.

Frequencies & Distribution

CoquiTel will achieve network goals by using 900 MHz, 2.4 GHz, 3.65 GHz and 5 GHz frequencies. The following sections with further describe their use in our network.

Backhaul

Backhaul used for the project would be provided by local providers: Caribe.Net (Critical Hub Networks) , PREPA, and /or AeroNet via Fiber or/ Wireless PTP. Final determination will be made depending on cost, viability of links, and conditions that may affect Quality of Service (QOS) and stability of network.

Backhaul will interconnected and distributed utilizing Licensed 3.65 GHz & 5 GHz (where 3.65 GHz is not viable) frequencies. This will provide protection from external interference, potential of higher capacity on the backhaul layer as well assure proper coordination with any existing or future 3.65 GHz providers or/ users.

Customer Access

On the access layer for customers, CoquiTel will use mixture of unlicensed frequencies in the 900 MHz, 2.4Ghz, and 5Ghz bands for its high Broadband Internet, VOIP, and Cellular offerings.

Our network design will be a strategically balanced mix of Fixed Wireless nodes at customer's specific customer's home, business, or / institutions' location and Access Points which will be strategically located to serve as local "Hot Spots" at specific points of interest for roamer or /on-the road network data traffic.

Data Traffic

Our customer's broadband data traffic will reside on either 2.4 GHz and/or 5 GHz frequencies. Fixed wireless nodes will primarily use 5 GHz where 2.4 GHz would run on Hotspots due to large availability of products (cellular, laptops, tablets, etc) utilizing the 2.4 GHz band.

Voice (VOIP) Traffic

Voice traffic would potentially reside on either on the three unlicensed frequency bands (900 MHz, 2.4 GHz, and 5 GHz) utilized by CoquiTel in the network.

5Ghz frequencies would be used at the Fixed Wireless node locations by the use of ATA adapters installed at customer's location or use of several soft SIP clients that would be used on customer's devices (computer, cellular, tablet, etc).

2.4 GHz voice traffic would reside at Hotspots when customers would utilize their personal devices with soft clients (SIP).

900 MHz frequencies would be utilized by cellular and mobile users. Due to the local topologies of central Puerto Rico (mountains, hills, valleys, and dense foliage) and the RF properties of the 900Mhz band, CoquiTel would be able to use it to provide a low cost, affordable, and robust GSM 2G voice service in or out of the home. 3G /4G services when manufacturer's upgrades are available. It should also be noted that the cellular device would not locked which would essentially allow the cellular device user to call on the 900Mhz frequencies or switch to WiFi data mode and place calls utilizing a SIP client to make calls on the 2.4 GHz frequency band.

Cost to subscriber

CoquiTel's goals to reach a price point as low as $19.99 for 1 Mbps , $ 29.99 for 4 Mbps, and $49.99 for 8 Mbps on our Broadband Unlimited monthly plans. VOIP unlimited plans would drop to as low $ 8.00 monthly assuming Lifeline eligibility.

CoquiPass product will sell for $19.99 month with no contractual obligation. CoquiPass would also be marketed on a daily basis rate.

CoquiCell would be marketed to the public on metered or unlimited basis.
CoquiCell unlimited monthly service would be marketed at a target price ranging between $ 30.00 and $ 34.99 monthly.
Prices on the metered plans would be defined at a future time.

State and/or Local or Tribal Government Participation in and/or Support for Project

Briefly describe collaborations with local and/or Tribal government entities in executing your project. Include plans to obtain rights of way and permits.

As part of the project, CoquiTel will finalize discussions with PREPA (Autoridad de Energía Eléctrica) to utilize their current infrastructure(light posts, backhaul, etc) to mount the various antennas and relays that will be used in the network deployment.

CoquiTel LLC will furthermore reach out to local government , Mayors, State Representatives , agencies, and offices in the proposed areas to formalize an alliance that will provide or improve Internet and Telephony access/connectivity to locations that are essential to their day to day operations.

Existing Providers

List the existing providers (if any) in the geographic area you plan to serve. Include the speed, price, and services they offer.
There are three existing carriers (where available) which are AT&T Wireless, Claro, and Liberty.

Offerings are as follows:

AT&T Wireless

Phone (Basic) with Internet $65.00/mo – Unlimited Talk with 1GB Data monthly
Phone (Smartphone) with Internet $95.00/mo– Unlimited Talk with 4GB Data monthly

- *Coverage is sparse on Wireless network.*
- *NO Unlimited data plans available. Tiered data plans only.*

- *Network performance is non-existent in certain areas and pricing not fixed due to lack of flat-rate options per customer surveys*

Claro

Internet $34.99/mo for 1Mps
Internet $39.99/mo for 3Mps
Internet $ 54.99/mo for 4 Mbps

- *Coverage is sparse on Wireless and DSL network.*
- *Unlimited data plans available when and where service is available*
- *Network performance poor to non-existent in certain areas per customer surveys*

Liberty

Internet $31.99/mo for 1Mps
Internet $41.99/mo for 3Mps
Internet $ 44.99/mo for 4 Mbps
Internet $ 59.99/mo for 10 Mbps

- *Carrier coverage is sparse on cable network.*
- *Unlimited data plans available when and where service is available*
- *Service inconsistent and high speed plans not available per our customer surveys*

Project Timeline/ Scalability

Provide a brief project timeline if you have one. If you do not have a project timeline, do not worry about this section.

*Project Timeline would be approximately **24 months** for project completion in the 8 towns/pueblos that the build out is projected to serve.*
Installation of network would be set in the following order of priority:

1. *Orocovis*
2. *Ciales*
3. *Coamo*
4. *Corozal*
5. *Villalba*
6. *Juana Diaz*
7. *Morovis*
8. *Barranquitas*

Backhaul and Node Installations

Acquisition of Backhaul (Circuit or WAN Gateway)

- Two circuits would be required for redundancy and addition backhaul capacity
Time: *1 - 2 months*

Site Analysis/ Acquisition

- Engineers will conduct site visits and perform system analysis to determine viability of interconnecting nodes.